

1 J. RANDALL JONES, ESQ. (#1927)
r.jones@kempjones.com
2 MICHAEL J. GAYAN, ESQ. (#11135)
m.gayan@kempjones.com
3 MONA KAVEH, ESQ. (#11825)
m.kaveh@kempjones.com
4 KEMP JONES, LLP
3800 Howard Hughes Parkway, 17th Floor
5 Las Vegas, Nevada 89169
Telephone: (702) 385-6000
6 Facsimile: (702) 385-6001

7 *Attorneys for Defendant*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 SARA SANGUINETTI, individually and on
behalf of all others similarly situated;

Case No.: 2:21-cv-01768-RFB-DJA

11 Plaintiffs,

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE ANSWER TO
PLAINTIFFS' AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT [ECF NO. 20]**

12 vs.

13 NEVADA RESTAURANT SERVICES,
INC.,

[SECOND REQUEST]

14

Defendant.

15 RAYMOND D. SPEIGHT, individually and
on behalf of all others similarly situated;

Consolidated With: 2:21-cv-01780-RFB-EJY

16

Plaintiffs,

17 vs.

18 NEVADA RESTAURANT SERVICES,
INC.,

19

Defendant.

20 Pursuant to Local Rules IA 6-1 and 7-1, Defendant Nevada Restaurant Services, Inc.
21 (“Defendant”), and Plaintiffs Sara Sanguinetti, Raymond D. Speight, David Dietzel, Patricia
22 Saavedra, and Nina S. Kuhlmann (“Plaintiffs”), by and through their counsel of record, hereby
23 stipulate, agree, and respectfully request that the Court extend the deadline for Defendant to file
24

25

1 its answer to Plaintiffs' Amended Consolidated Class Action Complaint ("Amended
 2 Complaint"), filed on November 16, 2021 (ECF No. 20), from August 26, 2022, to September
 3 9, 2022.

4 1. On November 16, 2021, Plaintiffs filed an Amended Complaint. ECF No. 20.
 5 Defendant requested and obtained an extension to respond to the Amended Complaint from
 6 November 30, 2021, to December 21, 2021. ECF No. 25.

7 2. On December 21, 2021, Defendant filed its Motion to Dismiss (ECF No. 26),
 8 which was heard on August 12, 2022. The Court granted in part and denied in part Defendant's
 9 Motion to Dismiss. ECF No. 46. Therefore, Defendants' Answer to the Amended Complaint
 10 would be due on or before August 26, 2022.

11 3. Defendant's counsel respectfully requests an extension to file its answer to
 12 Plaintiffs' Amended Complaint in light of their current schedule, other deadlines in this matter
 13 that the parties are working on, and to allow sufficient time for Defendant to review and assist
 14 in the preparation of the answer. Plaintiffs do not object to Defendant's request.

15 4. This request is not for purposes of delay. This is the second request for an
 16 extension to file a response to the Amended Complaint, but the first request for an extension to
 17 file an answer to the Amended Complaint after the Motion to Dismiss was ruled upon.

18 Dated August 25, 2022.

Dated August 25, 2022.

19 KEMP JONES, LLP

20 /s/ Mona Kaveh
 21 J. Randall Jones, Esq. (#1927)
 22 Michael J. Gayan, Esq. (#11135)
 23 Mona Kaveh, Esq. (#11825)
 3800 Howard Hughes Parkway, 17th Floor
 Las Vegas, Nevada 89169

24 Attorneys for Defendant
 25 Nevada Restaurant Services, Inc.

26 /s/ Gary Klinger
 27 Gary M. Klinger*
 28 MILBERG COLEMAN BRYSON
 PHILLIPS GROSSMAN, PLLC
 227 Monroe Street, Suite 2100
 Chicago, IL 60606

George Haines, Esq. (#9411)
 Gerardo Avalos, Esq. (#15171)
 FREEDOM LAW FIRM
 8985 South Eastern Ave., Suite 350
 Las Vegas, Nevada 89123

KEMP JONES, LLP
 3800 Howard Hughes Parkway
 Seventeenth Floor
 Las Vegas, Nevada 89169
 (702) 385-6000 • Fax (702) 385-6001
 kjc@kempjones.com

1 David Hilton Wise, Esq.
2 Joseph M. Langone, Esq.*
3 WISE LAW FIRM, PLC
421 Court Street
Reno, Nevada 89501

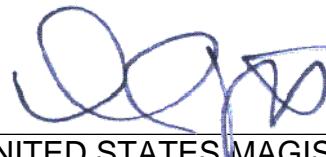
5 M. Anderson Berry, Esq.*
6 Gregory Haroutunian, Esq.*
7 CLAYÉO C. ARNOLD,
A PROFESSIONAL LAW CORP.
865 Howe Avenue
Sacramento, CA 95825

9 David K. Lietz*
10 MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
11 5335 Wisconsin Avenue NW, Suite 440
Washington, D.C. 20015-2052

12 Michael Kind, Esq. (#13903)
13 KIND LAW
14 8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

15 *Attorneys for Plaintiffs and the Class*
16 *pro hac vice

17 IT IS SO ORDERED:



18
19
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: August 26, 2022

KEMP JONES, LLP
3800 Howard Hughes Parkway
Seventeenth Floor
Las Vegas, Nevada 89169
(702) 385-6000 • Fax (702) 385-6001
kjc@kempjones.com